

**UNITED STATES DISTRICT COURT**

**RECEIVED**

District of New Jersey

**FEB 28 2025**

Charles Alford,

AT 8:30 \_\_\_\_\_ M  
CLERK, U.S. DISTRICT COURT - DNJ

Plaintiff,

V.

TransUnion LLC,

Defendant.

Case No.: [To be Assigned]

**COMPLAINT**

**1. Nature of the Action**

This is a civil action brought under the Fair Credit Reporting Act (FCRA), 15 U.S.C. 1681, to address violations of the Plaintiff's rights regarding the accuracy and integrity of consumer credit reports. The Defendant's failure to maintain accurate records and correct disputed errors has resulted in significant financial hardship, including an eviction lawsuit and the devastating loss of Plaintiff's unborn child due to stress caused by financial insecurity. The Plaintiff seeks actual damages, statutory damages, punitive damages, costs, and attorney's fees as remedies for Defendant's noncompliance with federal law.

## 2. Jurisdiction and Venue

- This Court has jurisdiction over this action pursuant to 15 U.S.C. 1681p (FCRA) and 28 U.S.C. 1331 (federal question jurisdiction).
- Venue is proper in this district under 28 U.S.C. 1391(b) because the Defendant conducts business in this district, and the Plaintiff resides here.

## 3. Parties

- Plaintiff: Charles Alford, an individual residing at 209 Lenape Lane, Pennsauken, NJ 08110.
- Defendant: TransUnion LLC, a consumer reporting agency as defined by the FCRA, with its principal place of business at 555 W Adams St, Chicago, IL 60661.

## 4. Background

### a. Inaccuracies in Plaintiff's Credit Report

On or about February 6, 2024, the Plaintiff reviewed his credit report from TransUnion and discovered significant inaccuracies, including:

- Incorrect address information,
- Inaccurate phone numbers, and
- The inclusion of a name, Dominique Mitchell, which does not belong to the Plaintiff.

These errors created obstacles in Plaintiff's ability to secure financial stability and directly contributed to his current financial crisis.

b. Dispute Process

On or about October 8, 2024, the Plaintiff submitted a formal dispute letter to TransUnion LLC, requesting an investigation and correction of these inaccuracies. Despite receiving evidence supporting the Plaintiff's dispute, TransUnion:

1. Failed to conduct a reasonable investigation as required under 15 U.S.C. 1681i(a).
2. Neglected to correct or remove the inaccurate information.

5. Defendant's Violations of the FCRA

TransUnion violated its obligations under the FCRA by:

- Failing to conduct a reasonable and timely investigation into the Plaintiff's dispute;
- Willfully and negligently continuing to report inaccurate and damaging information on the Plaintiff's credit report; and
- Ignoring evidence provided by the Plaintiff that demonstrated the inaccuracies.

6. Damages

a. Financial Harm

- Due to the errors in Plaintiff's credit report, he was unable to secure financial assistance, which led to severe financial hardship.
- Plaintiff fell behind on rent payments, ultimately resulting in eviction proceedings being

filed against him.

- Plaintiff was denied a personal loan that could have prevented his eviction.

b. Emotional and Mental Distress

- The ongoing financial hardship, eviction proceedings, and the Defendant's refusal to correct the inaccuracies in the Plaintiff's credit report caused severe emotional distress.
- The financial stress placed an overwhelming burden on Plaintiff and his wife, leading to significant emotional turmoil.
- Tragically, due to the extreme stress caused by their financial struggles and impending eviction, Plaintiff's wife suffered a miscarriage, causing further devastation to their family.

c. Additional Harm

- Long-term damage to Plaintiff's creditworthiness and financial reputation.
- Continued emotional suffering due to the miscarriage and the direct financial instability caused by TransUnion's negligence.

7. Relief Sought

The Plaintiff respectfully requests the Court grant the following relief:

1. Compensatory damages for financial loss, emotional distress, mental health suffering, and the loss of Plaintiff's unborn child.
2. Punitive damages to deter willful and negligent misconduct by the Defendant.

3. Attorney's fees and litigation costs incurred in pursuing this action.
4. An immediate correction of Plaintiff's credit report.
5. Any other relief the Court deems just and equitable.

## 8. Fraud Allegations

### a. TransUnion's Fraudulent Conduct

TransUnion engaged in fraudulent activity by knowingly and willfully reporting false information on Plaintiff's credit report after Plaintiff formally disputed the inaccuracies. Despite receiving clear and credible evidence that the reported information was incorrect, TransUnion:

1. Knowingly maintained false information on Plaintiff's credit file.
2. Misrepresented the accuracy of the credit report to third parties, including lenders and financial institutions.
3. Intentionally harmed Plaintiff's creditworthiness by refusing to correct the false information, despite having a legal duty to do so under the FCRA.

### b. Impact of Fraud on Plaintiff's Credit and Financial Standing

As a direct result of TransUnion's fraudulent conduct:

- Plaintiff's credit score dropped from 716 to 590, significantly impacting his financial stability.
- Plaintiff was subjected to higher interest rates and increased down payment requirements when attempting to secure a car loan.
- Plaintiff suffered irreparable financial harm, including difficulty securing loans and

credit opportunities due to the fraudulent misrepresentation of his credit history.

c. Violation of Consumer Protection Laws

TransUnion's conduct constitutes fraud, misrepresentation, and a willful violation of the FCRA under 15 U.S.C. 1681n, which provides for punitive damages when a credit reporting agency acts with reckless disregard for the truth.

9. Additional Relief Sought

In addition to the damages previously outlined, the Plaintiff seeks:

1. A declaration that TransUnion's conduct constitutes fraud and willful misconduct under the FCRA.
2. An immediate correction of Plaintiff's credit report to reflect accurate information.
3. Additional punitive damages for TransUnion's fraudulent and reckless disregard for Plaintiff's rights.

10. Demand for Jury Trial

The Plaintiff demands a trial by jury on all issues triable by a jury.

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Dated: 2/11/2025

A handwritten signature consisting of a stylized 'C' on the left, a diagonal line with a small peak in the middle, and a horizontal line extending to the right, ending with a small dot.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

## UNITED STATES DISTRICT COURT

for the

District of \_\_\_\_\_

Division \_\_\_\_\_

RECEIVED

FEB 28 2025

AT 8:30 M  
CLERK, U.S. DISTRICT COURT - DNU

Charles Alford

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Jury Trial: (check one)  Yes  No

TransUnion LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

## **I. The Parties to This Complaint**

#### **A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Charles Alford  
Address 209 Lenape Lane  
Pennsauken NJ 08110  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
County Camden  
Telephone Number 609-781-0776  
E-Mail Address KabeerPrints13@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name TransUnion LLC  
Job or Title (if known) Consumer  
Address 251 Little Falls Drive  
Wilmington, DE 19808  
City State Zip Code  
County New Castle  
Telephone Number N/A  
E-Mail Address (if known) N/A

**Defendant No. 2**

Name \_\_\_\_\_

**Job or Title (*if known*)**

## Address

*City*                   *State*                   *Zip Code*

## County

**Telephone Number**

E-Mail Address (*if known*)

Individual capacity     Official capacity

## Defendant No. 3

Name

Job or Title (*if known*)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (*if known*) Individual capacity     Official capacity

## Defendant No. 4

Name

Job or Title (*if known*)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (*if known*) Individual capacity     Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*): Federal officials (a *Bivens* claim)

Fair Credit Reporting Act (FCRA)

 State or local officials (a § 1983 claim)

## B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

The Plaintiff is suing TransUnion LLC for violating the Fair Credit Reporting Act by not properly investigating inaccuracies on her credit report.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

### **III. Statement of Claim (Please refer to attached claim)**

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

B. What date and approximate time did the events giving rise to your claim(s) occur?

C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

**IV. Injuries (Refer to Attached Claim)**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

**V. Relief (Refer to Attached Claim)**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2/27/25

Signature of Plaintiff



Printed Name of Plaintiff Charles Alford

**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address